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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 TELESOCIAL INC.,

12 Plaintiff,

13 v.

14 ORANGE S.A., et al.,

15 Defendants.
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Case No. 3:14-cv-03985-JD

**DECLARATION OF NIKKI STITT
SOKOL IN SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL**

Judge: Hon. James Donato

Date Filed: September 9, 2014

1 I, Nikki Stitt Sokol, declare as follows:

2 1. I am an attorney employed by Facebook, Inc., where I serve as Associate General
3 Counsel. I submit this Declaration in support of Plaintiff's Administrative Motion to Seal
4 Portions of Telesocial's and Orange's Summary Judgment and Daubert Briefings (ECF 226).

5 2. I have personal knowledge about the facts set forth herein, and if called upon to
6 testify as a witness thereto, I could do so competently under oath.

7 3. Facebook is a third party in this action and has at all times sought to protect the
8 confidentiality of its information. I am familiar with Facebook's confidentiality policies and
9 practices.

10 4. I have reviewed Exhibit 3, 4, and 19 to the Declaration of Todd Briggs in support
11 of Telesocial's Opposition (the "Exhibits"). Exhibit 4 is an excerpt of the transcript of the
12 Deposition of Adam Wolf, an employee of Facebook. Exhibits 3 and 19 are internal emails
13 between Facebook employees regarding a confidential Facebook project. These documents were
14 produced in response to a subpoena in this action; but for that subpoena this information would
15 never have been disclosed.

16 5. The Exhibits contain sensitive information regarding Facebook, Inc.'s internal
17 projects and business strategy. The documents and testimony represent information that
18 Facebook keeps completely confidential. Public disclosure of this information could provide a
19 competitive advantage to its competitors and could have negative effects on Facebook's business.
20 Accordingly, the Exhibits should be sealed.

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22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct, and that this declaration was executed on March 3, 2017 in Menlo
24 Park, California.

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27 _____
28 NIKKI STITT SOKOL